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 4 Attorney for Plaintiff
 5 ENVIRONMENTAL RESEARCH CENTER, INC.

FILED BY FAX
 ALAMEDA COUNTY
 September 29, 2015
 CLERK OF
 THE SUPERIOR COURT
 By Dolores Silva, Deputy
 CASE NUMBER:
RG15787548

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 8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 9 **COUNTY OF ALAMEDA**

10 ENVIRONMENTAL RESEARCH CENTER,
 11 INC., a non-profit California corporation,
 12 Plaintiff,
 13 v.
 14 NUTREX RESEARCH, INC. and DOES 1-25,
 Inclusive,
 15 Defendants.

Case No.

**COMPLAINT FOR INJUNCTIVE
 RELIEF AND CIVIL PENALTIES**

Health & Safety Code §25249.5, *et seq.*

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 18 Plaintiff Environmental Research Center, Inc. ("PLAINTIFF" or "ERC") brings this
 19 action in the interests of the general public and, on information and belief, hereby alleges:

20 **INTRODUCTION**

21 1. This action seeks to remedy the continuing failure of Defendants NUTREX
 22 RESEARCH, INC. and DOES 1-25 (collectively referred to as "NUTREX") to warn
 23 consumers in California that they are being exposed to lead, a substance known to the State of
 24 California to cause cancer, birth defects, and other reproductive harm. NUTREX
 25 manufactures, packages, distributes, markets, and/or sells in California the following products
 26 containing lead (collectively, the "PRODUCTS"):

- 1 a) Nutrex Research Inc. Muscle Infusion Chocolate Banana Crunch
- 2 b) Nutrex Research Inc. Muscle Infusion Chocolate
- 3 c) Nutrex Research Inc. Muscle Infusion Chocolate Peanut Butter Crunch

4 2. Lead (hereinafter, the “LISTED CHEMICAL”) is a substance known to the
5 State¹ of California to cause cancer, birth defects, and other reproductive harm.

6 3. The use and/or handling of the PRODUCTS causes exposures to the LISTED
7 CHEMICAL at levels requiring a “clear and reasonable warning” under California's Safe
8 Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code (“H&S Code”)
9 §25249.5, *et seq.* (also known as “Proposition 65”). NUTREX has failed to provide the health
10 hazard warnings required by Proposition 65.

11 4. NUTREX’s past sales and continued manufacturing, packaging, distributing,
12 marketing and/or sales of the PRODUCTS without the required health hazard warnings, cause
13 individuals to be involuntarily and unwittingly exposed to levels of the LISTED CHEMICAL
14 that violate Proposition 65.

15 5. PLAINTIFF seeks injunctive relief enjoining NUTREX from the continued
16 manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in
17 California without provision of clear and reasonable warnings regarding the risks of cancer,
18 birth defects, and other reproductive harm posed by exposure to the LISTED CHEMICAL
19 through the use and/or handling of the PRODUCTS. PLAINTIFF seeks an injunctive order
20 compelling NUTREX to bring its business practices into compliance with Proposition 65 by
21 providing a clear and reasonable warning to each individual who has been and who in the
22 future may be exposed to the LISTED CHEMICAL from the use of the PRODUCTS.
23 PLAINTIFF also seeks an order compelling NUTREX to identify and locate each individual
24 person who in the past has purchased the PRODUCTS, and to provide to each such purchaser a
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¹ All statutory and regulatory references herein are to California law, unless otherwise specified.

1 clear and reasonable warning that the use of the PRODUCTS will cause exposures to the
2 LISTED CHEMICAL.

3 6. In addition to injunctive relief, PLAINTIFF seeks an assessment of civil
4 penalties up to the maximum civil penalty of \$2,500 per day per exposure authorized by
5 Proposition 65 to remedy NUTREX's failure to provide clear and reasonable warnings
6 regarding exposures to the LISTED CHEMICAL.

7 **JURISDICTION AND VENUE**

8 7. This Court has jurisdiction over this action pursuant to California Constitution
9 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes
10 except those given by statute to other trial courts." The statute under which this action is
11 brought does not specify any other basis for jurisdiction.

12 8. This Court has jurisdiction over NUTREX because, based on information and
13 belief, NUTREX is a business having sufficient minimum contacts with California, or
14 otherwise intentionally availing itself of the California market through the distribution and sale
15 of the PRODUCTS in the State of California to render the exercise of jurisdiction over it by the
16 California courts consistent with traditional notions of fair play and substantial justice.

17 9. Venue in this action is proper in the Alameda Superior Court because NUTREX
18 has violated California law in the County of Alameda.

19 **PARTIES**

20 10. PLAINTIFF is a non-profit corporation organized under California's
21 Corporation Law. ERC is dedicated to, among other causes, reducing the use and misuse of
22 hazardous and toxic substances, consumer protection, worker safety, and corporate
23 responsibility.

24 11. ERC is a person within the meaning of H&S Code §25118 and brings this
25 enforcement action in the public interest pursuant to H&S Code §25249.7(d).

1 reasonable” warning requirements of Proposition 65 beginning on October 1, 1993 (27 CCR §
2 25000, *et seq.*; H&S Code §25249.6 *et seq.*). Due to the carcinogenicity of lead, the no
3 significant risk level for lead is 15 ug/day (micrograms a day). (27 CCR § 25705(b)(1).)

4 22. On June 15, 2015, PLAINTIFF sent a 60-Day Notice of Proposition 65
5 (“Notice”) violations to the requisite public enforcement agencies, and to NUTREX. The
6 Notice was issued pursuant to, and in compliance with, the requirements of H&S Code
7 §25249.7(d) and the statute's implementing regulations regarding the notice of the violations to
8 be given to certain public enforcement agencies and to the violators. A true and correct copy
9 of the 60-Day Notice is attached hereto as **Exhibit A** and incorporated by reference. The
10 Notice was issued as follows:

- 11 a. NUTREX and the California Attorney General were provided copies of the
12 Notices of Violations, along with a Certificate of Merit by the attorney for
13 the noticing party stating that there is a reasonable and meritorious cause for
14 this action. The requisite county district attorneys and city attorneys were
15 provided copies of the Notices of Violations and Certificates of Merit.
- 16 b. NUTREX was provided, with the Notices of Violations, a copy of a
17 document entitled “The Safe Drinking Water and Toxic Enforcement Act of
18 1986 (Proposition 65): A Summary,” which is also known as Appendix A to
19 Title 27 of CCR § 25903.
- 20 c. The California Attorney General was provided, with the Notices of
21 Violations, additional factual information sufficient to establish a basis for
22 the Certificates of Merit, including the identity of the persons consulted with
23 and relied on by the certifier, and the facts, studies, or other data reviewed
24 by those persons, pursuant to H&S Code §§25249.7(d)(1) and
25 25249.7(h)(2).

26 23. At least 60-days have elapsed since PLAINTIFF sent the NOTICE to

1 NUTREX. The appropriate public enforcement agencies have failed to commence and
2 diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against NUTREX
3 based on the allegations herein.

4 24. Plaintiff is informed and believes, and based on such information and
5 belief, alleges the PRODUCTS have been marketed, distributed, and/or sold to
6 individuals in California allegedly been sold by NUTREX for use in California without
7 the requisite clear and reasonable warnings before, on, and after June 15, 2012. The
8 PRODUCTS continue to be distributed and sold in California without the requisite
9 warning information.

10 25. As a proximate result of acts by NUTREX, as a person in the course of doing
11 business within the meaning of H&S Code §25249.11(b), individuals throughout the State of
12 California, including in the County of Alameda, have been exposed to lead without clear and
13 reasonable warnings. The individuals subject to exposures to lead include normal and
14 foreseeable users of the PRODUCTS, as well as all other persons exposed to the PRODUCTS.

15 26. At all times relevant to this action, NUTREX has knowingly and intentionally
16 exposed the users and/or handlers of the PRODUCTS to lead without first giving clear and
17 reasonable warnings to such individuals.

18 27. Individuals using or handling the PRODUCTS are exposed to lead in excess of
19 the “maximum allowable daily” and “no significant risk” levels determined by the State of
20 California, as applicable.

21 28. At all times relevant to this action, each Defendant has, in the course of doing
22 business, failed to provide individuals using and/or handling the PRODUCTS with a clear and
23 reasonable warning that the PRODUCTS exposure individuals to lead.

24 29. The PRODUCTS continue to be marketed, distributed, and/or sold in California
25 without the requisite clear and reasonable warnings.

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FIRST CAUSE OF ACTION

**(Injunctive Relief for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the PRODUCTS described in the June 15, 2015, Prop. 65 Notice)
Against NUTREX**

30. PLAINTIFF re-alleges and incorporates by reference each and every preceding allegation and paragraph as though fully set forth in this cause of action.

31. By committing the acts alleged in this Complaint, NUTREX, at all times relevant to this action, and continuing through the present, has violated H&S Code §25249.6 by, in the course of doing business, knowingly and intentionally exposing individuals who use or handle the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6 and 25249.11(f).

32. By the above-described acts, NUTREX has violated H&S Code § 25249.6 and is therefore subject to an injunction ordering NUTREX to stop violating Proposition 65, to provide warnings to all present and future customers, and to provide warnings to NUTREX's past customers who purchased or used the PRODUCTS without receiving a clear and reasonable warning.

33. An action for injunctive relief under Proposition 65 is specifically authorized by Health & Safety Code §25249.7(a).

34. Continuing commission by NUTREX of the acts alleged above will irreparably harm the citizens of the State of California, for which harm they have no plain, speedy, or adequate remedy at law.

35. Wherefore, PLAINTIFF prays for judgment against NUTREX, as set forth hereafter.

SECOND CAUSE OF ACTION

**(Civil Penalties for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the PRODUCTS described in PLAINTIFF's NOTICE)
Against NUTREX**

1 first providing a clear and reasonable warning, within the meaning of Proposition 65, that the
2 users and/or handlers of the PRODUCTS are exposed to the LISTED CHEMICAL;

3 B. an injunctive order, pursuant to H&S Code §25249.7(b), compelling
4 DEFENDANTS to identify and locate each individual who has purchased the PRODUCTS
5 since June 15, 2012, and to provide a warning to such person that the use of the PRODUCTS
6 will expose the user to chemicals known to birth defects and other reproductive harm;

7 C. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),
8 against NUTREX in the amount of \$2,500 per day for each violation of Proposition 65;


9 D. An award to PLAINTIFF of its reasonable attorney's fees and costs pursuant to
10 California Code of Civil Procedure §1021.5 or the substantial benefit theory;

11 E. An award of costs of suit herein; and

12 F. Such other and further relief as may be just and proper.

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14 Dated: September 28, 2015

WRAITH LAW



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16 By: _____

WILLIAM F. WRAITH
Attorney for Plaintiff
Environmental Research
Center

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EXHIBIT A

WRAITH LAW
24422 AVENIDA DE LA CARLOTA
SUITE 400
LAGUNA HILLS, CA 92653
Tel (949) 452-1234
Fax (949) 452-1102

June 15, 2015

**NOTICE OF VIOLATIONS OF
CALIFORNIA HEALTH & SAFETY CODE SECTION 25249.5 ET SEQ.
(PROPOSITION 65)**

Dear Alleged Violator and the Appropriate Public Enforcement Agencies:

I represent Environmental Research Center, Inc. ("ERC"), 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. (619) 500-3090. ERC's Executive Director is Chris Heptinstall. ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

ERC has identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), which is codified at California Health & Safety Code §25249.5 *et seq.*, with respect to the products identified below. These violations have occurred and continue to occur because the alleged Violator identified below failed to provide required clear and reasonable warnings with these products. This letter serves as a notice of these violations to the alleged Violator and the appropriate public enforcement agencies. Pursuant to Section 25249.7(d) of the statute, ERC intends to file a private enforcement action in the public interest 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

General Information about Proposition 65. A copy of a summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is attached with the copy of this letter served to the alleged Violator identified below.

Alleged Violator. The name of the company covered by this notice that violated Proposition 65 (hereinafter the "Violator") is:

Nutrex Research, Inc.

Consumer Products and Listed Chemical. The products that are the subject of this notice and the chemical in those products identified as exceeding allowable levels are:

Nutrex Research Inc. Muscle Infusion Chocolate Banana Crunch - Lead
Nutrex Research Inc. Muscle Infusion Chocolate - Lead
Nutrex Research Inc. Muscle Infusion Chocolate Peanut Butter Crunch – Lead

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

It should be noted that ERC may continue to investigate other products that may reveal further violations and result in subsequent notices of violations.

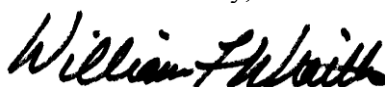
Route of Exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products. Consequently, the primary route of exposure to this chemical has been and continues to be through ingestion, but may have also occurred and may continue to occur through inhalation and/or dermal contact.

Approximate Time Period of Violations. Ongoing violations have occurred every day since at least June 15, 2012, as well as every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until this known toxic chemical is either removed from or reduced to allowable levels in the products. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemical. The method of warning should be a warning that appears on the product label. The Violator violated Proposition 65 because it failed to provide persons handling and/or using these products with appropriate warnings that they are being exposed to this chemical.

Consistent with the public interest goals of Proposition 65 and a desire to have these ongoing violations of California law quickly rectified, ERC is interested in seeking a constructive resolution of this matter that includes an enforceable written agreement by the Violator to: (1) reformulate the identified products so as to eliminate further exposures to the identified chemical, or provide appropriate warnings on the labels of these products; (2) pay an appropriate civil penalty; and (3) provide clear and reasonable warnings compliant with Proposition 65 to all persons located in California who purchased the above products in the last three years. Such a resolution will prevent further unwarned consumer exposures to the identified chemical, as well as an expensive and time consuming litigation.

ERC has retained me as legal counsel in connection with this matter. **Please direct all communications regarding this Notice of Violations to my attention at the law office address and telephone number indicated on the letterhead.**

Sincerely,



William F. Wraith

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Nutrex Research, Inc. and its Registered Agent for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

CERTIFICATE OF MERIT

Re: Environmental Research Center, Inc.'s Notice of Proposition 65 Violations by Nutrex Research, Inc.

I, William F. Wraith, declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the party identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.

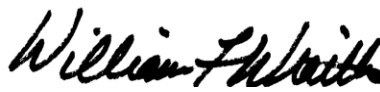
2. I am an attorney for the noticing party.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the notice.

4. Based on the information obtained through those consultants, and on other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and that the information did not prove that the alleged Violator will be able to establish any of the affirmative defenses set forth in the statute.

5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & Safety Code §25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: June 15, 2015



William F. Wraith

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On June 15, 2015, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY"** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current President or CEO
Nutrex Research, Inc.
579 South Econ Circle
Oviedo, FL 32765

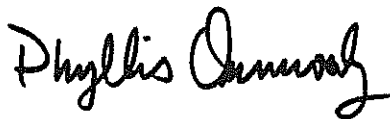
Jens Ingenohl
(Registered Agent for Nutrex Research, Inc.)
579 South Econ Circle
Oviedo, FL 32765

On June 15, 2015, I verified the following documents **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** were served on the following party when a true and correct copy thereof was uploaded on the California Attorney General's website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice>:

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Oakland, CA 94612-0550

On June 15, 2015, I served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties on the Service List attached hereto, and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Priority Mail.

Executed on June 15, 2015, in Fort Oglethorpe, Georgia.



Phyllis Dunwoody

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

June 15, 2015

Page 5

Service List

District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009
District Attorney, Amador County 708 Court Street Jackson, CA 95642	District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202	District Attorney, Yolo County 301 2 nd Street Woodland, CA 95695
District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965	District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338	District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408	District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482	District Attorney, San Mateo County 400 County Ctr., 3 rd Floor Redwood City, CA 94063	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012
District Attorney, Colusa County 346 Fifth Street Suite 101 Colusa, CA 95932	District Attorney, Merced County 550 W. Main Street Merced, CA 95340	District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	San Diego City Attorney's Office 1200 3rd Avenue, Ste 1620 San Diego, CA 92101
District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553	District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110	San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102
District Attorney, Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517	District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060	San Jose City Attorney's Office 200 East Santa Clara Street, 16 th Floor San Jose, CA 95113
District Attorney, El Dorado County 515 Main Street Placerville, CA 95667	District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902	District Attorney, Shasta County 1355 West Street Redding, CA 96001	
District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	District Attorney, Napa County 931 Parkway Mall Napa, CA 94559	District Attorney, Sierra County PO Box 457 Downieville, CA 95936	
District Attorney, Glenn County Post Office Box 430 Willows, CA 95988	District Attorney, Nevada County 201 Commercial Street Nevada City, CA 95959	District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097	
District Attorney, Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501	District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243	District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95354	
District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney, Sutter County 446 Second Street Yuba City, CA 95991	
District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230	District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814	District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080	
District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney, San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023	District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093	
District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291	